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Co-Counsel for the Class 10 Liquidation Trust

_____	:	UNITED STATES BANKRUPTCY COURT
In the Matter of:	:	FOR THE DISTRICT OF NEW JERSEY
	:	HONORABLE GLORIA M. BURNS
SHAPES/ARCH HOLDINGS, L.L.C., et	:	CASE NO. 08-14631(GMB)
al.,	:	
	:	(Jointly Administered)
Debtors.	:	
	:	Chapter 11
_____	:	<b>NOTICE OF MOTION OF THE CLASS 10 LIQUIDATION TRUST FOR AN ORDER GRANTING A FURTHER EXTENSION OF TIME TO FILE OBJECTIONS TO LITIGATION CLAIMS AND INSIDER CLAIMS AND TO ASSERT OBJECTIONS UNDER §502(d) OF THE BANKRUPTCY CODE</b>

HEARING DATE AND TIME:  
January \_\_\_, 2009, at \_\_\_\_\_.m.

**ORAL ARGUMENT WAIVED UNLESS  
OBJECTIONS TIMELY FILED**

TO: All Parties-in-Interest

PLEASE TAKE NOTICE that pursuant to an Order Shortening Time entered by the Bankruptcy Court on January\_\_\_\_, 2009, on the \_\_\_\_ day of January, 2009, at \_\_\_\_\_ o'clock in the \_\_\_\_\_ noon, or as soon thereafter as counsel may be heard, the undersigned, attorneys for the Class 10 Liquidation Trust, shall move before the Honorable Gloria M. Burns, United States Bankruptcy Judge, at the United States Bankruptcy Court, Mitchell H. Cohen U.S. Courthouse, 400 Cooper Street, 4<sup>th</sup> Floor, Camden, New Jersey 08101, for entry of an Order granting a further extension of time to file objections to litigation claims and insider claims and to assert objections under§502(d) of the bankruptcy code (the "Motion").

PLEASE TAKE FURTHER NOTICE that in support of the Motion, the undersigned shall rely on the accompanying Application, which sets forth the relevant factual and legal bases upon which the requested relief should be granted. A proposed Order granting the requested relief also is submitted herewith.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall be filed in accordance with the Order Shortening Time.

PLEASE TAKE FURTHER NOTICE that unless objections are timely filed, the Motion shall be deemed uncontested in accordance with D.N.J. LBR 9013-1(a), and the relief requested may be granted without further notice or hearing.

PLEASE TAKE FURTHER NOTICE that the undersigned does not request oral argument unless objections are timely filed.

Respectfully submitted,

**HALPERIN BATTAGLIA RAICHT, LLP**  
Co-Counsel for the Class 10 Liquidation Trust

By: /s/ Donna H. Lieberman  
Donna H. Lieberman  
Carrie E. Mitchell

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FORMAN & LEONARD, P.A.**  
Co-Counsel for the Class 10 Liquidation Trust

By: /s/ Ilana Volkov  
Ilana Volkov

DATED: January 16, 2009